

# CDM Federal Programs Corporation

November 22, 1988

ENVIRONMENTAL PROTECTION  
AGENCY REGION II  
NEW YORK, N.Y.

91 MAY 10 PM 12: 3

PERMITS ADMINISTRATIVE  
BRANCH

Rose Harvell  
Project Officer  
U.S. Environmental Protection Agency  
401 M Street, Room 2834  
Washington, D.C. 20460

PROJECT: EPA CONTRACT NO.: 68-01-7331  
DOCUMENT NO.: T591-R02-EP-CDJC-2  
SUBJECT: Revised Draft Report for EPA Work Assignment 591  
Compliance Evaluation Inspection  
Contact Industries  
Elizabeth, New Jersey  
Document Control No.: T591-R02-DR-CCHF-3

NTD 00 2052017

Dear Ms. Harvell:

Please find enclosed the Revised Draft Report entitled, "Compliance Evaluation Inspection, Contact Industries, Elizabeth, New Jersey", as partial fulfillment of the reporting requirements for this work assignment.

If you have any comments regarding this submittal, please contact Eddy S. Lin of PRC Environmental Management, Inc. at (312)856-8700 within two weeks from the date of this letter.

Sincerely,

CDM Federal Programs Corporation



Robert D. Goltz, P.E.  
TES III Regional Manager

PFF/mea

Enclosure

cc: Ton Moy, EPA Primary Contact, RCRA Region II  
Derval Thomas, EPA Regional Contact, RCRA Region II  
Lisa McDaniel, EPA HQ Coordinator, RCRA Region II  
Harry Butler, CDM Federal Programs Corporation, Deputy Program Manager  
(letter and cover only)  
Barbara Kuberski, EPA Contracting Officer (letter only)  
Daniel Chow, PRC Environmental Management, Inc. (letter only)  
Document Control, CDM Federal Programs Corporation (2 copies)

(WP2/31)

(Master/6)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II  
26 FEDERAL PLAZA  
NEW YORK, NEW YORK 10278

DEC 14 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Peter Piranian  
Plant Manager  
Contact Industries, Inc.  
641 Dowd Avenue  
Elizabeth, New Jersey 07201

Re: Contact Industries, Inc.  
EPA ID No. NJD002052017

Dear Mr. Piranian:

This Warning Letter is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 ("RCRA") and the Hazardous and Solid Waste Amendments of 1984 ("HSWA") 42 U.S.C. §§ 6901, 6928.

Pursuant to HSWA on November 7, 1986, EPA promulgated regulations which prohibited the land disposal of restricted waste. 51 Fed. Reg. 40,572 (November 7, 1986). These regulations are published in 40 CFR Part 268, and amend various sections of 40 CFR Parts 260-265 and 270. They became effective on November 8, 1986.

The State of New Jersey is authorized by EPA to conduct a hazardous waste program under Section 3006 of RCRA, 42 U.S.C. § 6926. However, the authorized State program does not include provisions of HSWA, and regulations promulgated thereunder. EPA has the sole authority to implement and enforce regulations promulgated pursuant to HSWA, including the land disposal regulations ("LDR").

On or about April 14, 1988, a duly authorized representative of EPA conducted an inspection of Contact Industries, Inc, Elizabeth, New Jersey, pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927. During this inspection, the EPA inspector noted that:

1. 40 CFR § 268.7(a)(1) which is one of the provisions of the LDR, has been violated. Section 268.7(a)(1) requires the following:

Before a generator offers waste subject to the LDR to a treatment facility, the generator must notify the treatment facility in writing of the appropriate treatment standards set forth in Subpart D of 40 CFR Part 268.

The notice must include the following information:

- (i) EPA Hazardous Waste Number;
- (ii) The corresponding treatment standards and all applicable prohibitions set forth in § 268.32 or RCRA section 3004(d);
- (iii) The manifest number associated with the shipment of the waste; and
- (iv) Waste analysis data, where available.

At the time of the above referenced inspection, several manifest copies were found to be without the required notice. EPA requires adherence to its regulations. If you have not already done so, you must take immediate remedial action to implement the regulations published in 40 CFR Part 268. You must submit within thirty (30) days of the receipt of this letter, documentation, and a description of the actions you have taken to correct the violations noted above and to implement the regulations published in 40 CFR Part 268.

Failure to comply with the requirements of this Warning Letter may subject you to penalties of up to twenty-five thousand dollars (\$25,000) for each day of noncompliance in accordance with Section 3008 of RCRA, 42 U.S.C. § 6928.

If you have any questions regarding this matter, please contact Mr. James Sullivan, of my staff at (212) 264-6150.

Sincerely yours,

George C. Meyer, P.E., Chief  
Hazardous Waste Compliance Branch

cc: Karl Delaney, Assistant Director  
Hazardous Waste Enforcement  
New Jersey Department of  
Environmental Protection





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II  
26 FEDERAL PLAZA  
NEW YORK, NEW YORK 10278

DEC 14 1988

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Peter Piranian  
Plant Manager  
Contact Industries, Inc.  
641 Dowd Avenue  
Elizabeth, New Jersey 07201

Re: Contact Industries, Inc.  
EPA ID No. NJD002052017

Dear Mr. Piranian:

This Warning Letter is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 ("RCRA") and the Hazardous and Solid Waste Amendments of 1984 ("HSWA") 42 U.S.C. §§ 6901, 6928.

Pursuant to HSWA on November 7, 1986, EPA promulgated regulations which prohibited the land disposal of restricted waste. 51 Fed. Reg. 40,572 (November 7, 1986). These regulations are published in 40 CFR Part 268, and amend various sections of 40 CFR Parts 260-265 and 270. They became effective on November 8, 1986.

The State of New Jersey is authorized by EPA to conduct a hazardous waste program under Section 3006 of RCRA, 42 U.S.C. § 6926. However, the authorized State program does not include provisions of HSWA, and regulations promulgated thereunder. EPA has the sole authority to implement and enforce regulations promulgated pursuant to HSWA, including the land disposal regulations ("LDR").

On or about April 14, 1988, a duly authorized representative of EPA conducted an inspection of Contact Industries, Inc, Elizabeth, New Jersey, pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927. During this inspection, the EPA inspector noted that:

1. 40 CFR § 268.7(a)(1) which is one of the provisions of the LDR, has been violated. Section 268.7(a)(1) requires the following:

Before a generator offers waste subject to the LDR to a treatment facility, the generator must notify the treatment facility in writing of the appropriate treatment standards set forth in Subpart D of 40 CFR Part 268.



The notice must include the following information:

- (i) EPA Hazardous Waste Number;
- (ii) The corresponding treatment standards and all applicable prohibitions set forth in § 268.32 or RCRA section 3004(d);
- (iii) The manifest number associated with the shipment of the waste; and
- (iv) Waste analysis data, where available.

At the time of the above referenced inspection, several manifest copies were found to be without the required notice. EPA requires adherence to its regulations. If you have not already done so, you must take immediate remedial action to implement the regulations published in 40 CFR Part 268. You must submit within thirty (30) days of the receipt of this letter, documentation, and a description of the actions you have taken to correct the violations noted above and to implement the regulations published in 40 CFR Part 268.

Failure to comply with the requirements of this Warning Letter may subject you to penalties of up to twenty-five thousand dollars (\$25,000) for each day of noncompliance in accordance with Section 3008 of RCRA, 42 U.S.C. § 6928.

If you have any questions regarding this matter, please contact Mr. James Sullivan, of my staff at (212) 264-6150.

Sincerely yours,

George C. Meyer, P.E., Chief  
Hazardous Waste Compliance Branch

cc: Karl Delaney, Assistant Director  
Hazardous Waste Enforcement  
New Jersey Department of  
Environmental Protection

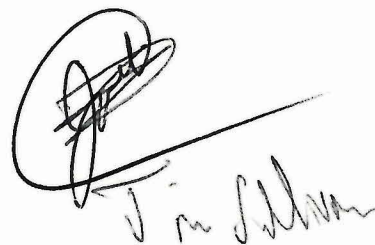
2/23/89

641 Dowd Avenue, Elizabeth, New Jersey 07201

(201) 351-5900 • (800) 526-6832

February 22, 1989

Mr. George C. Meyer, P.E. Chief  
Hazardous Waste Compliance Branch  
United States Environmental Protection  
Agency - Region 11  
26 Federal Plaza  
New York, N. Y. 10278



Re: Contact Ind, Inc.  
EPA ID #NJD002052017

Dear Mr. Meyer:

I am responding to your letter sent to Contact Industries just before the New Year. Please accept my apology for not acting quicker as my Waste Disposal Consultant was traveling in Europe, as well as myself.

We had a shipment of waste removed on 12/6/86 and were unaware of the new regulations which went into effect on 11/7/86 (51 FED Reg. 40,572). Hereafter, when waste is removed from our facility, we will be sure to adhere to this regulation and fill out the required forms.

The particular shipment in question was the last time we had hazardous waste removed from our premises. We now have a still to reclaim THE MATERIAL AS "WASH SOLVENT". If we ever have the need to remove waste again we, of course, will notify the treatment facility in writing set forth in SUB PART D OF 40 CFR PART 268 and investigate the necessary requirements more carefully.

Please accept my apology on our oversight and I thank the EPA for bringing this matter to our attention.

Enclosed is the "Restricted Waste Shipment Notification" lacking for the removal of waste 12/6/86 as well as a copy of the Uniform Hazardous Waste Manifest.

If you have any questions, please have the EPA contact me to discuss the matter further at 201-351-5900.

MEMBERS OF



Mr. George C. Meyer, P.E. Chief

February 22, 1989

Once again, please accept our apology for the oversight in the above matter.

Regards.

Very truly yours,

CONTACT INDUSTRIES



Peter Piranian, Jr.,  
General Manager

PPJR/pg



## RESTRICTED WASTE SHIPMENT

## NOTIFICATION

## I. Identification Information:

Generator: Contact Industries

Manifest No.:

STATE:

PAB 3130256Address: 641 Dowd Avenue

Completed by:

Peter Piranian, Jr.Elizabeth, N.J. 07201

Title:

General ManagerEPA ID No.: NJD002052017

Date:

2/1/89

This shipment as referenced by the Manifest Number contains waste(s) which correspond to the following USEPA Hazardous Waste Number(s): F001 \_\_\_\_\_, F002 \_\_\_\_\_, F003 x, F004 \_\_\_\_\_, F005 x. Additional Waste Numbers may be listed on the Manifest.

The constituent composition identified in this Table is based upon:

\_\_\_\_\_ An attached waste analysis

X My thorough knowledge of the waste stream

## II. Table CCWE:

Check the appropriate boxes identifying the constituent and corresponding treatment standard(s) applicable to this waste shipment.

		mg/L		
		Wastewaters containing spent solvent	All other spent solvent wastes	
F001-F005 spent solvents				
Acetone	<input type="checkbox"/>	0.05	<input checked="" type="checkbox"/>	0.50
n-Butyl alcohol	<input type="checkbox"/>	5.0	<input type="checkbox"/>	5.0
Carbon disulfide	<input type="checkbox"/>	1.05	<input type="checkbox"/>	4.81
Carbon tetrachloride	<input type="checkbox"/>	.05	<input type="checkbox"/>	.96
Chlorobenzene	<input type="checkbox"/>	.15	<input checked="" type="checkbox"/>	.05
Cresols (and cresylic acid)	<input type="checkbox"/>	2.82	<input type="checkbox"/>	.75
Cyclohexanone	<input type="checkbox"/>	.125	<input type="checkbox"/>	.75
1,2-dichlorobenzene	<input type="checkbox"/>	.68	<input type="checkbox"/>	.125
Ethyl acetate	<input type="checkbox"/>	.05	<input checked="" type="checkbox"/>	.75
Ethyl benzene	<input type="checkbox"/>	.05	<input type="checkbox"/>	.053
Ethyl ether	<input type="checkbox"/>	.05	<input type="checkbox"/>	.75
Isobutanol	<input type="checkbox"/>	5.0	<input type="checkbox"/>	5.0
Methanol	<input type="checkbox"/>	.25	<input checked="" type="checkbox"/>	.75
Methylene chloride	<input type="checkbox"/>	.20	<input checked="" type="checkbox"/>	.96
Methylene chloride (from the pharmaceutical industry)	<input type="checkbox"/>	12.7	<input type="checkbox"/>	.96
Methyl ethyl ketone	<input type="checkbox"/>	0.05	<input type="checkbox"/>	0.75
Methyl isobutyl ketone	<input type="checkbox"/>	0.05	<input type="checkbox"/>	0.33
Nitrobenzene	<input type="checkbox"/>	0.65	<input type="checkbox"/>	0.125
Pyridine	<input type="checkbox"/>	1.12	<input type="checkbox"/>	0.33
Tetrachloroethylene	<input type="checkbox"/>	0.079	<input checked="" type="checkbox"/>	0.05
Toluene	<input type="checkbox"/>	1.12	<input checked="" type="checkbox"/>	0.33
1,1,1 - Trichloroethane	<input type="checkbox"/>	1.05	<input checked="" type="checkbox"/>	0.41
1,2,2 - Trichloro - 1,2,2 trifluoroethane	<input type="checkbox"/>	1.05	<input type="checkbox"/>	0.96
Trichloroethylene	<input type="checkbox"/>	0.062	<input type="checkbox"/>	0.091
Trichlorofluoromethane	<input type="checkbox"/>	0.05	<input checked="" type="checkbox"/>	0.96
Xylene	<input type="checkbox"/>	0.05	<input checked="" type="checkbox"/>	0.15

## III. Statement of Certification:

For those generators whose waste stream contains the constituents identified in Table CCWE of 40 CFR Part 268 (above) and must be treated at least to those respective concentration levels specified.

Name Peter Piranian, Jr.

Signature

Peter Piranian, Jr.

Date

2/6/88

**PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES**  
**Bureau of Waste Management**  
P. O. Box 2063  
Harrisburg, PA 17120

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)  
Form Approved. OMB No. 2000-0404. Expires 7-31-86

ER-SWM-51:REV. 10/84

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. N.J.D.0.0.2.0.5.2.0.1.7		Manifest Document No. 0.0.0.0.3		2. Page 1 of 1 Information in the shaded areas is not required by Federal law but is required by State law.							
3. Generator's Name and Mailing Address CONTACT INDUSTRIES 641 Dowd Ave. Elizabeth, New Jersey 07201						A. State Manifest Document Number PA-13180256							
						B. State Gen. ID							
4. Generator's Phone (201) 351-5900						C. State Trans. ID PA-AH 0.0.5.2							
5. Transporter 1 Company Name INDUSTRIAL SOLVENTS & CHEMICAL CO. P.A.D.0.9.8.7.3.2.1.1.8						D. Transporter's Phone (718) 266-7015							
7. Transporter 2+ Company Name						E. State Trans. ID PA-AH							
9. Designated Facility Name and Site Address INDESTRIAL SOLVENTS & CHEMICAL CO. RD #1 Stevens Rd. Yorkhaven, PA 17370 P.A.D.0.9.8.7.3.2.1.1.8						F. Transporter's Phone ( )							
						G. State Facility's ID Not Required							
						H. Facility's Phone ( )							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. WASTE ORM-A ORM F002 NA1693						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
						0.3.3 D.M.		1.8.1.5 G		F.0.0.2			
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code) Haz. Code Physical State a. 1 1 A F002 c. 1 1 1 1 b. 1 1 1 1 d. 1 1 1 1						K. Handling Codes for Wastes Listed Above a. Sol c. b. d.							
15. Special Handling Instructions and Additional Information a. 0504C N.J. #24488													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002 (b) of RCRA, I also certify that I have a program in place to reduce volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.													
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name MATTHEW MORRIS Signature Matthew Morris Month Day Year 12 30 86													
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name P. STAHL Signature P. Stahl Month Day Year 12 30 86													
19. Discrepancy Indication Space (1) Waste ORM-A, NOS, ORM-B, NA1693 (11a) Material actually received: Waste Flammable Liquid NOS, Flammable Liquid, UN1193 (2) F002/D001 (H) 717-938-4621													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name P.M. La Salle Signature P.M. La Salle ss Month Day Year 12 30 86													



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II  
26 FEDERAL PLAZA  
NEW YORK, NEW YORK 10278

Mr. Peter Piranian, Jr.  
General Manager  
Contact Industries  
641 Dowd Avenue  
Elizabeth, New Jersey 07201

RE: Contact Industries  
NJD002052017

Dear Mr. Piranian

Your submittal in response to the warning letter dated December 15, 1988 has been deemed satisfactory. Your company has been entered in our Data Management System as having achieved physical compliance with the violation cited in the above referenced letter. This matter can now be considered concluded and the enforcement action resolved.

Please be advised your facility is under the continuing obligation to comply with all the applicable state and federal regulations regarding the management of hazardous waste. Subsequently, if your facility should be found in violation of the regulation in the future, you may be subject to escalated enforcement action, including monetary penalties. If you have any questions contact James Sullivan at (212) 264-6150.

Sincerely yours,

George Meyer, P.E., Chief  
Hazardous Waste Compliance Branch

cc: Karl Delaney  
Assistant Director  
Hazardous Waste Enforcement  
New Jersey Department of  
Environmental Protection

bcc: L. Livingston, PAB  
G. Meyer, AWM-HWC  
J. Sullivan, AWM-HWC



Inputted

1/15

needs

Owner

name

U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

## FOR OFFICIAL USE ONLY

## COMMENTS

INSTALLATION'S EPA I.D. NUMBER APPROVED DATE RECEIVED (yr., mo., &amp; day)

F N3D00205201721 811014

## I. NAME OF INSTALLATION

CONTACT INDUSTRIES INC

## II. INSTALLATION MAILING ADDRESS

## STREET OR P.O. BOX

3641 DOWD AVENUE

## CITY OR TOWN

ELIZABETH

## ST.

NJ 07201

## III. LOCATION OF INSTALLATION

## STREET OR ROUTE NUMBER

641 DOWD AVENUE

## CITY OR TOWN

ELIZABETH

## ST.

NJ 07201

## IV. INSTALLATION CONTACT

## NAME AND TITLE (last, first, &amp; job title)

2 PETER PIRANIAN JR

## PHONE NO. (area code &amp; no.)

MGR 201-851-5900

## V. OWNERSHIP

## A. NAME OF INSTALLATION'S LEGAL OWNER

8

## B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL  
M = NON-FEDERAL

M

## VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

## C. INSTALLATION'S EPA I.D. NO.

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.



I.D. - FOR OFFICIAL USE ONLY																
S															T/A	C
W																1
1	2												13	14	15	

# IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**D. LISTED INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES.** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE  
(D001)

☐ 2. CORROSIVE  
(D002)

☐ 3. REACTIVE  
(D003)

☐ 4. TOXIC  
(D000)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) Mourad S. Nersesian, Ex. Vice Pres.	DATE SIGNED 10/7/81
---	--	------------------------





641 Dowd Avenue, Elizabeth, New Jersey 07201

(201) 351-5900 • (800) 526-6832

October 7, 1981

Ms. R. Phillips  
EPA Information Service Center  
Room 302  
26 Federal Plaza  
New York, New York 10278

Dear Ms. Phillips:

Your office address was given to me over the phone to mail the enclosed application to obtain an Installation EPA I.D. No.

From time to time, we may have some intermediate chemical products that we want picked up for proper disposition.

Your kind consideration to mail us an I.D. no. will be appreciated.

Yours very truly,

CONTACT INDUSTRIES, INC.

A handwritten signature in dark ink, appearing to read "M. Nersesian", written over a horizontal line.

Mourad S. Nersesian  
Executive Vice President

MSN:cm

Enclosure

MEMBERS OF





641 Dowd Avenue, Elizabeth, New Jersey 07201

(908) 351-5900 • Fax (908) 351-6037

April 24, 1995

Mr. George C. Meyer, P.E. Chief  
Hazardous Waste Compliance Branch  
United States Environmental Protection Agency - Region II  
290 Broadway  
New York, New York 10007-1866

Re: Contact Industries  
E.P.A. I.D. #NJD 002052017

Dear Mr. Meyer;

I received your letter of March 17th on March 22nd, notifying us that we failed to furnish all of the LDR notifications for the past five (5) years to Mr. Stephan Szardenings of the NJ DEP during an on site inspection in August of 1994.

As you stated, we did not have copies of the five manifest numbers listed in your letter at the time of the inspection. A subsequent search of our files has failed to turn up any of the five copies shown.

The firm, which our records show has serviced this location since 1990, Safety Kleen, was contacted by me to see if their records differed from ours. They conducted a search of their files, and supplied me with duplicates of the manifests that they have in their files on this past Tuesday (4/18/95). Their records and the records that we have co-incide. They did not have any copies of the missing manifests.

Ms. Gottlieb of your office has told me that she would attempt to supply me with some information regarding the missing documents. At this time I am unable to determine when the material covered by these manifests was transported and by whom it was transported.

One of the missing manifests, #PAC7417502, we have attempted to trace through a company called Industrial Solvents & Chemicals in Yorkhaven, Pennsylvania, a company which handled waste from this location in the 1980's. We have determined that they are no longer in business. The Pennsylvania Department of Environmental Protection put us in touch with a company called the PRP group, and also a company called T.L.I. who they thought might be able to help us. Neither of them were able to confirm that Industrial Solvents & Chemicals actually handled the materials covered by Manifest #PAC7417502.

MEMBERS OF



RECEIVED  
4/28/95 JC

In 1992, the offices of Contact Industries were combined with those of our parent company, Safeguard Chemical Corporation. I don't know if the records in question were lost and/or destroyed during this move.

I am at a loss as how to proceed from this point, and will appreciate any guidance you can give.

Very truly yours,

CONTACT INDUSTRIES

A handwritten signature in dark ink, appearing to read "Louis J. Van Bergen", written over the printed name.

Louis J. Van Bergen  
Plant Manager

LJVB:ss

cc: Peter Piranian



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II

290 BROADWAY

NEW YORK, NEW YORK 10007-1866



Jessica

17 MAR 1995

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Louis VanBergen, Plant Manager  
Contact Industries, Inc.  
641 Dowd Avenue  
Elizabeth, New Jersey, 07201

Re: Contact Industries  
EPA I.D. No. NJD002052017

Dear Mr. VanBergen:

This Notice of Violation is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984 42 U.S.C. § § 6901, 6928.

Pursuant to HSWA, the U.S. Environmental Protection Agency (EPA) has promulgated regulations since November 7, 1986, which prohibits the land disposal of restricted waste. These regulations are published in 40 C.F.R. Part 268, and amend various sections of 40 C.F.R. Parts 260-265 and 270.

The State of New Jersey is authorized by EPA to conduct a hazardous waste program under Section 3006 of RCRA, 42 U.S.C. § 6926. However, the authorized State program does not include provisions of HSWA, and regulations promulgated thereunder. EPA has the sole authority to implement and enforce regulations promulgated pursuant to HSWA, including the land disposal restrictions (LDR).

On August 9 and 11, 1994, Mr. Stephan Szardenings of NJDEP conducted an inspection of Contact Industries, Inc., Elizabeth, New Jersey, pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927. During this inspection, the inspector noted that:

1. 40 C.F.R. § 268.7(a)(7), which is one of the provisions of the LDR, has been violated. Section 268.7(a)(7) requires the following:

A generator must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is the subject of such documentation was sent to on-site or off-site treatment, storage or disposal. The five year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator.

At the time of the above referenced inspection, five of the manifest copies were found to be without the required LDR notifications and the facility failed to retain on-site copies of all of the LDR notifications for at least five years. The referenced manifest numbers are as follows: PAC7417502, NJA1675740, NJA1041392, NJA1179480 and NJA1384059.

Be advised, EPA requires adherence to its regulations. If you have not already done so, you must take immediate remedial action to implement the regulations published in 40 C.F.R. Part 268. You must submit, within thirty (30) days of the receipt of this correspondence, documentation, and a description of the actions you have taken to correct the violation noted above and to implement the regulations published in 40 C.F.R. Part 268.

Failure to comply and submit the documentation requested in this Notice of Violation subjects you and/or your company to the enforcement provisions of Section 3008 of RCRA, 42 U.S.C § 6928.

If you have any questions regarding this matter, please contact Ms. Gottlieb, at (212) 637-4148.

Sincerely yours,  
Original Signed By  
**George C. Meyer**

George C. Meyer, P.E., Chief  
Hazardous Waste Compliance Branch

cc: James Hamilton, Assistant Director  
Office of Enforcement Policy  
New Jersey Department of Environmental  
Protection

5/8

Spoke w/ Mr. VanBergen & let him know that he is okay as far as the LOR attachments but I would be sending a letter re: haz waste > 1 year

5/2 Spoke w/ Stephan said that manifests were not missing during inspection. Also said that there were drums stored for > 90 days (LOR violation). He is sending me a copy of the report.

Lou VanBergen

908-351-5900

4/19 - UM for Stephan S.

4/2 - UM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II

290 BROADWAY  
NEW YORK, NEW YORK 10007-1866

COPY FOR YOUR  
INFORMATION

MAY 15 1995

Mr. Louis VanBergen, Plant Manager  
Contact Industries, Inc.  
641 Dowd Avenue  
Elizabeth, New Jersey, 07201

Re: Contact Industries  
EPA I.D. No. NJD002052017

Dear Mr. VanBergen:

We have received your submittal in response to the U.S. Environmental Protection Agency's (EPA) Notice of Violation dated March 17, 1995. Upon review of the information you provided and further review of our files, it has been determined that you are not in violation of 40 C.F.R. § 268.7(a)(7).

We did, however, conclude that you were in violation of 40 C.F.R. § 268.50(c) which is another provision of the LDR. Section 268.50(c) requires that the owner or operator of a treatment, storage or disposal facility which stores restricted wastes beyond one year bears the burden of proving that such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal.

We are not going to issue an Notice of Violation for this LDR provision since the NJDEP has already cited Contact Industries for violation of N.J.A.C. 7:26-9.3(a)1 which allows a generator to accumulate hazardous waste on-site without a permit for 90 days or less provided that all such waste is, within 90 days or less, shipped off-site to an authorized facility, as defined at N.J.A.C. 7:26-1.4. By complying with N.J.A.C. 7:26-9.3(a)1, Contact Industries will also comply with 40 C.F.R. § 268.50(c).

Please be advised your facility is under the continuing obligation to comply with all the applicable state and federal regulations regarding the management of hazardous waste. Subsequently, if your facility should be found in violation of the regulation in the future, you may be subject to escalated enforcement action, including monetary penalties. If you have any questions, direct them to Ms. Jessica Gottlieb, at (212) 637-4148.



Sincerely yours,

Original signed by  
Joel Golumbek

Joel Golumbek, Chief  
NJ/Caribbean Compliance Section

cc: James K. Hamilton, Assistant Director  
Office of Enforcement Policy  
New Jersey Department of Environmental  
Protection and Energy